

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Tyreek T. Cooper,

Debtor.

Case No. 21-12506-mdc

Chapter 13

Debtor's Motion to Modify Chapter 13 Plan

AND NOW, Debtor Tyreek T. Cooper, by and through his attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor hereby requests that the amended Chapter 13 Plan filed as ECF No. 111 be approved by the court and adopted as the confirmed chapter 13 plan.

2. The proposed plan: (i) adjusts payment on the secured claim of Wells Fargo Bank N.A. as stipulated by the parties, and (ii) provides for payment of attorney fees to the Debtor's counsel for post-confirmation services.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in his favor as may be necessary and proper under the law.

Date: December 20, 2023

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com